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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal corporation,

Defendant.

Case No.

DECLARATION OF ANDY GREEN IN
SUPPORT OF PETITION FOR TEMPORARY
RESTRANING ORDER

I, Andy Green, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. I went with my pregnant wife, Samira, and my two teenage kids to the demonstrations in Downtown Portland on June 2, 2020. Before going, I had a group discussion with my kids about how we're not there to cause harm, but to support the Black Lives Matter movement and protest the recent repression. As a Muslim family in America, we thought it was important to be with our Black neighbors to protest the violence we had witnessed on the news.
3. Around 6:15 pm, we arrived downtown and walked down Pioneer Sq. It was pretty mellow, and we heard some people gave speeches.
4. At around 7:45 pm, we heard that there was a march coming over the bridge and we went down and met it at SW 6th and Oak, then marched back up to pioneer. I met another friend at this point, and we hung out on the edges of Pioneer Square for a while. Not a lot was going on, and it was a kind of a party, celebratory atmosphere.
5. Around 8:45 pm, people started marching down SW Yamhill and turned right on SW 4th. I specifically said to my family, let's hang back but we can wait a couple minutes and then go see what they're doing. We got to the NW corner of SW 4th and Taylor and made a decision to wait at least 100 feet behind the crowd next to a dumpster in front of the old bagel joint. We were more than a full block behind the fence
6. My kids went a little further in the crowd and met up with some other friends of mine, while staying in text communication with me. At 9:04 pm, I texted my friend that we were going wait back by the dumpster. He immediately responded they were "keeping

their distance." My other friend texted me at 9:08 pm saying that they were with the kids and that they were good.

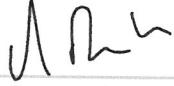
7. The police kept saying over the loud speaker not to mess with the fence or they'd use physical force. Since they said specifically "don't touch the fence," I purposefully watched the fence and saw no movement at all.
8. About 9:06 pm, the cops announced it was an unlawful assembly. It all of a sudden appeared as if the cops were now also pushing the group at SW Yamhill towards us. It started getting hectic, almost like a palpable group fear or panic was starting.
9. At 9:08, my friend texted me he thought maybe tear gas was thrown and they would meet us at the dumpster. I did not see gas at this time. We met and said goodbye to my other friends and I thought the smartest exit was to head up SW Taylor and to the west towards our car. Right away I started hearing bangs and everyone took off running.
10. I freaked out as I saw my kids run but also needed to wait with my wife as she could not move very fast as she was pregnant. The gas got closer and closer until they were launching it in front of us so we had no choice but to run through the cloud. It was incredibly painful and terrifying. I had a canister whiz by my head and land less than a few feet from me.
11. By Broadway and Taylor my wife could not run any more due to heavy coughing. A group stopped and helped us flush our eyes. My wife continued to cough, had to sit down and ultimately vomited. My concern was that she was coughing so hard it was going to start contractions. My friend ran forward to get the car and ultimately picked us up at SW Taylor and 10th.
12. My wife is now too scared to go back downtown while simultaneously wanting to show her support. I have had two Traumatic Brain Injuries since 2016, and still have

neurological effects and have been fighting a migraine and coughing since last night.

13. There was no hint of provocation by either my family or any group I saw. I honestly just felt like we embodying the spirit to assemble, petition the government and make our voices heard. This appeared to me to be a military style maneuver to inflict as much punishment on the protesters as possible.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 4, 2020.



Andy Green (Jun 5, 2020 16:09 PDT)